

17 November 2025

F.E.E.D.M. Position

Official Control Methods for the Detection of Foreign Sugar Addition in Honey

The *Fédération Européenne des Emballeurs et Distributeurs de Miel* (F.E.E.D.M.), representing the interests of European honey packers and distributors covering approximately 80% of the European honey market, reaffirms its strong commitment to ensuring the authenticity and quality of honey marketed in the EU. F.E.E.D.M. stands for authentic and pure honey and strongly supports the work of beekeepers across the EU and around the world. Securing consumers' trust in honey is at the heart of our commitment by guaranteeing that authenticity testing is based on sound science and transparent procedures.

F.E.E.D.M. members operate according to the highest standards, working closely with national authorities, the European Commission – including the Joint Research Centre (JRC) and the "HarmHoney"-project – and scientific institutions to improve, validate, and standardise analytical methods. We firmly believe in science-based official controls and actively support the development of robust and reliable testing techniques to detect potential honey adulteration.

In recent times, allegations of "non-authentic" honey have emerged in several Member States, sometimes relying on analytical approaches that are not clearly recognised under the current EU regulatory framework. F.E.E.D.M. emphasises the importance of distinguishing between preliminary screening indications and legally enforceable evidence of adulteration, to ensure fair treatment of operators and avoid reputational damage based on non-validated data.

F.E.E.D.M. believes that only methods that are properly validated, internationally standardised, and fully compliant with EU and national legal requirements should be used for authenticity testing at Official Control Level. This is essential for safeguarding food safety, ensuring a level playing field in the market, and protecting both consumers and the beekeeping community.

Legal Framework and Standardisation

Under the current EU system, food control lies in the responsibility of the EU-Member States. However, article 34 of Regulation (EU) 2017/625 establishes a clear hierarchy for the selection of analytical methods to be used in official controls. Furthermore, Commission Notice (EU) 2022/C467/02 on the implementation of Regulation (EU) 2017/625 was published with the purpose of compiling clarifications and best practices with regard to the most requested provisions in order to contribute to a harmonised understanding and application of these provisions by Member States' competent authorities and stakeholders.

The regulatory "cascade" requires the use of methods adopted by Union legislation or recommended by internationally recognised standardisation bodies, when available. Only in the absence of such methods may authorities apply those developed by EU Reference Laboratories (EURLs), or, ultimately, methods validated at national level in accordance with internationally accepted scientific protocols (e.g., ISO 5725 as referenced by Annex III of Regulation (EU) 2017/625 regarding inter-laboratory validation and harmonisation criteria).

Currently, two of the commonly used methods for honey authenticity testing meet the highest tier of this hierarchy:

- **AOAC 998.12 (EA-IRMS)**: validated for the detection of C4 plant-derived sugars.
- **EN 17958 (LC-IRMS)**: validated for the detection of C3/C4 plant-derived sugars.

They have been validated according to internationally accepted protocols and published by standardisation bodies explicitly named in Article 34(2)(a), making them the legally appropriate choice for official controls across the EU.

However, in the recently convened “HarmHoney”-project and the Honey Platform, expert groups are working on the harmonisation and validation of further commonly used methods – like LC-HRMS and H-NMR – for honey authenticity testing. F.E.E.D.M. supports these projects with our expert knowledge. F.E.E.D.M. therefore emphasises the importance of advancing the analytical progress in this area in order to be able to assign more of the methods already commonly used to the highest tier of this hierarchy. It is important for our association to support analytical advances in our daily business. However, in order to maintain a level playing field, official controls have to stick to the rules laid down by the European Commission.

F.E.E.D.M. expects that the application of official methods in Member States follows this hierarchy as defined by the Regulation. In this regard, we positively acknowledge the recent publication of **UNI 11972:2025** by the Italian national standardisation body **UNI**, which offers legal clarity within the Italian market by confirming the formal recognition of a method through a national standardisation process. This development exemplifies how national initiatives can contribute to regulatory certainty when aligned with the principles of the Official Controls Regulation (EU) 2017/625. While national standardisation initiatives provide clarity within individual markets, F.E.E.D.M. stresses the importance of EU-wide harmonisation to maintain a level playing field and avoid divergent interpretations between Member States.

Addressing Regulatory Fragmentation

Despite the existence of a harmonised legal framework, we continue to observe divergence in its application. Certain authorities rely on analytical methods that, while possibly accredited at national level, may not meet the higher requirements of international standardisation. Such practices risk undermining legal certainty, distorting competition, and fragmenting the internal market. It is therefore essential to ensure that enforcement actions are based on methods that comply with the full legal hierarchy defined in EU law.

While recognising the important role of national authorities in enforcing food law, it remains crucial that such enforcement aligns with harmonised EU requirements to maintain a level playing field. F.E.E.D.M. therefore calls on the European Commission to intensify the work in the current EU-projects in order to achieve a faster official validation of further analytical methods.

Supporting Innovation and Scientific Progress

F.E.E.D.M. is strongly committed to scientific and technological advancement. Our members actively contribute to the development and validation of new analytical approaches through initiatives such as the “HarmHoney”-project. We also strongly support the goals set out in Directive (EU) 2024/1438, which calls on the European Commission to formally adopt additional fit-for-purpose methods by 14 June 2028. This is a key step toward a more transparent, robust, and future-oriented system for honey authenticity. Ultimately, such innovation benefits consumers by ensuring authenticity and supports beekeepers by protecting the integrity of their products.

Call for Regulatory Clarity and Harmonisation

F.E.E.D.M. believes that EU-wide harmonisation of authenticity testing is essential to guarantee fair competition and maintain and strengthen confidence throughout the honey supply chain. F.E.E.D.M. therefore calls on the European Commission to provide clear guidance to Member States to ensure uniform implementation and avoid national divergences. We advocate:

- That only methods recognised under the legal hierarchy of Article 34(2)(a) of Regulation (EU) 2017/625 be used in official controls;
- That new methods be validated and standardised through transparent, international and EU-coordinated processes before being adopted for enforcement;
- That cooperation between authorities, laboratories, and industry remains open, science-based, and clearly communicated.

F.E.E.D.M. remains fully committed to contributing constructively to regulatory developments and to upholding the highest standards of food authenticity. The integrity of the honey sector – and the confidence of all actors involved – relies on legal certainty, scientific credibility, and harmonised implementation.

Best regards,
F.E.E.D.M.

Closing remark: This paper reflects the views of the F.E.E.D.M. members. The German, French and Benelux member organisations did not endorse the position due to divergent perspectives.